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Of Counsel
John Taylor Williams
David L. Kelston

September 26, 2014

BY CERTIFIED MAIL

Curt Spalding, Regional Administrator
EPA New England, Region 1,
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Gina McCarthy, Administrator
U.S. EPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

U.S. Department of Justice
Citizen Suit Coordinator
Environmental and Natural Resource
Division Law and Policy Section
P.O. Box 7611
Washington, D.C. 20044-7611

Re: Notice of Proposed Consent Decree in Clean Water Action v. UFP Belchertown, LLC et al. Civil Action No. 13-cv-30182

Dear Sirs and Madam:

Enclosed pursuant to 40 CFR § 135.5 please find an executed copy of the parties' proposed Consent Decree resolving the above captioned action brought under the citizen suit provision of the Federal Water Pollution Control Act. Please feel free to call me if you have any questions about the enclosed. Thank you.

Sincerely,

Nora J. Chorover

Enclosures

cc: Peter F. Durning, Esq.

90 Canal Street Boston, MA 02114-2022
617-742-5800 Fax: 617-742-5858 E-Mail: sswg@sswg.com

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September 26, 2014

BY CERTIFIED MAIL

Dmitry Alexandrovich Shashkov, President and CEO
H.C. Starck, Inc.
45 Industrial Place
Newton, MA 02461
Certified Mail # 7012 2210 0001 3554 3482

Re: 60-Day Notice of Violations and Intent to File Suit Regarding Noncompliance with Federal Clean Water Act's Industrial Stormwater Discharge Requirements: 45 Industrial Place, Newton MA

Dear Mr. Shashkov:

This office represents Clean Water Action, a national non-profit citizens' organization working for prevention of pollution in the nation's waters, protection of natural resources, creation of environmentally-safe jobs and businesses, and empowerment of people to make democracy work. Clean Water Action has over one million members nationally, more than 50,000 of whom reside in Massachusetts.

We write to give notice that Clean Water Action intends to file a civil action in the United States District Court for the District of Massachusetts under Section 505 of the Federal Clean Water Act (the "Act") against H.C. Starck, Inc. ("H.C. Starck"). The subject of the action will be H.C. Starck's unlawful discharge of stormwater from its primary and fabricated metal products manufacturing facility at 45 Industrial Place in Newton, MA (the "Facility"). Stormwater runoff from the Facility is discharged into South Meadow Brook and the Charles River via the Boston Water and Sewer storm drain system.

H.C. Starck submitted a Notice of Intent ("NOI") to be covered by EPA's reissued Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (the

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"Permit") on February 19, 2009.[1] However, since then it has failed to submit any Discharge Monitoring Reports or Annual Reports to the EPA as required in the Permit.

BACKGROUND

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to the weather. As runoff from rain or snowmelt comes into contact with these materials, it picks up pollutants and transports them to nearby rivers, lakes, or coastal waters and tributaries thereto, including but not limited to storm sewer systems, wetlands, and other surface waters. Stormwater pollution is a significant source of water quality problems for the nation's waters.

The following are *some* of the activities, pollutant sources and pollutants that may be present with H.C. Starck's primary metals manufacturing activities:[2]

Activity	Pollutant Source	Pollutant
Material storage and handling	Metal product stored outside such as foundry returns, scrap metal, turnings, fines, ingots, bars, pigs, wire including materials coated with oil to prevent corrosion or residual chemicals from cleaning or treating	Residual or protective oil and grease, metals, total suspended solids (TSS), chemical oxygen demand
	Outdoor storage or handling of fluxes	pH (limestone)
	Storage of poles, bins, or material handling of coke or coal	(COD)
	Storage or handling of casting sand or refractory (from piles, hoppers, or bins)	Toss, pH, metals, phenolic compounds
	Leaks and spills of acids or solvents from drums or tanks	TSS, pH, toxicity depending on material

[1] The Stormwater Permit expired on September 29, 2013, but has been administratively continued by its own terms.

[2] Source: EPA Industrial Stormwater Fact Sheet Series, Sector F: Primary Metals Facilities, recovered from http://water.epa.gov/polwaste/npdes/stormwater/upload/sector_f_primarymetals.pdf.

Vehicle and equipment fueling and maintenance	Vehicle fueling and maintenance or outdoor storage tanks and drums of gas, diesel, kerosene, lubricants, solvents	Oil and grease, diesel, gasoline, TSS, antifreeze
Waste materials (handling, storage, and disposal)	Slag or dross stored or disposed of outside in poles or drums	Metals, pH
	Fly ash, particulate emissions, dust collector sludges and solids, baghouse waste	TSS
	Storage and disposal of waste sand or refractory rubble in poles outside	TSS, metals, misc. "wet" sand additives
	Machining waste – fines, turnings, oil, borings, gates, sprues, scale	TSS, metals, Oil and grease
	Obsolete equipment stored outside	Oil and grease, metals
	Landfilling or open pit disposal of wastes on-site	Metals, cyanide, cadmium, arsenic, hexavalent chromium, or halogenated or chlorinated solvents
Furnace operations and pollution control equipment	Losses during charging of coke ovens or sintering plants and from particulate emissions	TSS, particulates, metals, volatiles, pH
	Fugitive emissions from poorly maintained or malfunctioning baghouses, scrubbers, electrostatic precipitators, cyclones	TSS, metals
	Wastewater treatment operations exposed to precipitation	TSS, metals
Furnace operations and pollution control equipment	Particulate emissions from blast furnaces, electric arc furnaces, induction furnaces	TSS, Oil and grease, ammonia-N, cyanide, phenolic compounds, dissolved iron, toxic organic pollutants, metals (depending on operation)

Rolling, casting, and finishing operations	Exposure of wastewater used for cooling or descaling related to rolling	Oil and grease, pH, TSS, metals, COD
	Storage of products outside after painting, pickling, or cleaning operations	pH, solvents, metals
	Casting cooling or shakeout	TSS, metals
	Losses of particulate matter from machining operations (grinding, drilling, boring, cutting)	Metals, TSS, Oil and grease
Plant yards	Areas of the facility with unstabilized soils subject to erosion and sediment loss	TSS
Illicit discharges	Improper connection of floor, sink, or process wastewater drains to storm sewers	Dependent on source

The following are *some* of the activities, pollutant sources and pollutants that may be present with H.C. Starck's fabricated metals manufacturing facility:[3]

Activity	Pollutant Source	Pollutant
Tool workpiece interface/shaving, chipping	Used metal working fluid with fine metal dust	Total suspended solids (TSS), chemical oxygen demand (COD), oil and grease
Parts/tools cleaning, sand blasting, metal surface cleaning, removal of applied chemicals	Solvent cleaners, abrasive cleaners, alkaline cleaners, acid cleaners, rinse waters	Spent solvents, TSS, acid/alkaline waste, oil
	Solvents, cold and hot dips, cleaning parts, degreasing	Acid, coolants, clean composition, degreaser, mineral spirits, pickle liquor, spent caustic, sludge

[3] Source: EPA Industrial Stormwater Fact Sheet Series, Sector AA: Fabricated Metal Products Manufacturing Facilities, recovered from http://water.epa.gov/polwaste/npdes/stormwater/upload/sector_aa_fabmetal.pdf.

Making structural components	Cuttings, scraps, turnings, fines	Metals
Painting operations	Paint and paint thinner spills, sanding, spray painting	Paints, spent solvents, heavy metals, TSS
	Empty containers, paint application wastes, spills, over spraying, storage areas	Paint wastes, thinner, varnish, heavy metals, spent chlorinated solvents
Cleanup of spills and drips	Used absorbent materials	TSS, spilled material
Transportation or storage of materials	Wood dunnage/pallets	BOD, TSS
Metal preparation	Grinding, welding, sawing, shaving, brazing, bending, cutting, etching	Steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, Teflon, manganese
Surface treatment	Finishing, plating, case hardening, chemical coating, coating, polishing, rinsing, abrasive cleaning, electroplating	Acid, aromatic solvent, corn cob, lubricants, sand, oil, pH, nitrate, nitrites, carbon, phosphates, borates, nitrogen, oily sludge, nickel, chromium, hydrofluoric acid
Galvanizing	Spills, leaks, transporting materials	Acid solution, phosphates, zinc chromate, hexavalent chromium, nickel
Heavy equipment use and storage	Leaking fluids, fluids replacement, washing equipment	Oil, heavy metals, organics, fuels, TSS, hydraulic oil, diesel fuel, gasoline
Equipment/vehicle maintenance	Leaking fluids, fluids replacement, washing equipment	Oil, grease
	Vehicle fueling	Gas/diesel fuel, fuel additives

Storage of uncoated structural steel	Stored on porous pavement	Aluminum, lead, zinc, copper, iron, oxide, oil, nickel, manganese
Storing galvanized steel directly on the ground	Galvanizing material drippage or leaching	Metals: zinc, nickel, cadmium, chromium
Vehicle/equipment traffic	Soil disturbance and erosion	TSS from erosion, hydraulic fluid loss/spillage
Cleaning equipment/vehicles	Chemicals disposed improperly, spillage	Oil, grease, surfactants, chromates, acid, hydroxide, nitric acid

Clean Water Action will ask the Court to ensure H.C. Starck's future compliance with the Act, assess civil penalties in an appropriate amount,[4] award plaintiff its litigation costs, including attorney and expert fees, and award any other relief the Court deems appropriate. Clean Water Action's complaint will be filed a minimum of 60 days after the postmark date of this letter. This is a formal 60-day notice of intent to sue that is being served pursuant to 40 C.F.R., Part 135.

This notice is being provided by:

Cindy Luppi, New England Regional Co-Director
Clean Water Action
262 Washington Street, Suite 301
Boston, MA 02108
(617) 338-8131
(617) 335-6449 (fax)

Counsel for Clean Water Action in this case is:
Nora J. Chorover
Stern, Shapiro, Weissberg & Garin, LLP
90 Canal Street, Suite 500
Boston, MA 02114
(617) 742-5800
(617) 742-5858 (fax)

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[4] The Statute authorizes the Court to assess a penalty of up to $37,500 a day for each violation. *See* 33 U.S.C. § 1319(d) and 78 Fed. Reg. 66647 (Nov. 6, 2013).

H.C. STARCK'S VIOLATIONS AND DATES OF VIOLATIONS

H.C. Starck's violations are described below and are also set forth on a Table attached as Exhibit A hereto.[5] The Complaint, when filed, will set forth additional days of violations that occur between the date of this letter and the date on which the Complaint is filed.

A. VIOLATIONS OF THE TERMS OF THE PERMIT

The company has violated the permit's terms, as follows:

1. Failure to Comply with the Permit's Monitoring Requirements

H.C. Starck is required to monitor its discharges in accordance with the specific provisions of Section 6 of the Permit (pgs. 33-40) and Appendix B, Section B. This includes monitoring for benchmark parameters applicable to primary and fabricated metals manufacturing facilities. Permit, Section 8.F.5 and Section 8.AA.5. H.C. Starck was required to monitor for the presence of Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Total Recoverabel Aluminum, Total Recoverable Copper, Total Recoverable Iron, Total Recoverable Lead, and Total Recoverable Zinc in its stormwater discharges for each quarter commencing with the April 1 – June 30, 2009, quarter. Quarterly monitoring is required to continue until four consecutive quarterly samples show that the company's discharges are below EPA benchmark levels.[6] H.C. Starck failed to comply with these monitoring requirements.[7]

To the extent additional monitoring violations become known to Clean Water Action before the action is filed, the complaint will seek remedy for such additional monitoring violations. To the extent additional monitoring violations are learned through discovery in the action, the complaint will be amended to seek remedy for such additional monitoring violations.[8]

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[5] Clean Water Action believes that violations have occurred on the dates identified in this letter and on Exhibit A, and not just on rain days. However, to the extent it is determined that rain days are relevant in determining the dates of violations, such rain dates through September 22, 2014 are set forth on Exhibit B hereto. The complaint, when filed, will set forth additional rain dates since September 22, 2014.

[6] See Permit, Section 6.2.1.2.

[7] Each failure to conduct benchmark monitoring for each parameter is a separate violation for each day that the failure continued.

[8] Additional discovered monitoring violations may include, without limitation: failure to ensure representative sampling (Permit, App. B, Section B(1)(A), pg. B-5); failure to monitor from all facility outfalls (*id.*, Section 6.1.1, pg. 33); failure to monitor during a measurable storm event following the preceding storm by at least 3 days (*id.*, Section 6.1.3, pg. 33); failure to conduct monitoring in accordance with test procedures approved under 40 CFR Part 136 (*id.*, App. B,

2. Failure to Comply with the Permit's Inspection Requirements.

The Permit requires facilities to conduct routine facility inspections, quarterly visual assessments, and annual comprehensive site inspections.[9] Comprehensive site inspections must be completed by no later than September 29th of each year of permit coverage. Annual reports that include the results of these comprehensive site inspections must be submitted to EPA no later than 45 days following the inspection.[10] H.C. Starck failed to comply with the inspection and annual reporting requirements, as set forth in Exhibit A. To the extent additional reporting violations become known the Clean Water Action before the action is filed, the complaint will seek remedy for such additional reporting violations.

3. Failure to Comply with the Permit's Reporting Requirements.

H.C. Starck is required to report certain information to EPA and the Massachusetts Department of Environmental Protection ("Mass DEP") regarding its stormwater discharges in accordance with the provisions of Section 7 of the Permit. Among other things, H.C. Starck must submit quarterly benchmark monitoring data to EPA. See Permit, Section 7.1.[11] Benchmark monitoring reports were to have been filed with EPA 30 days following receipt of monitoring results. H.C. Starck failed to comply with this requirement, as set forth on Exhibit A.[12]

H.C. Starck is also required to prepare and submit to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. See Permit, Section 7.2. H.C. Starck failed to comply with this requirement, as set forth on Exhibit A.

To the extent additional reporting violations become known to Clean Water Action before the action is filed, the complaint will seek remedy for such additional reporting violations.

Section B(10), pg. B-6); or failure to sample within the first 30 minutes of a measurable storm event (*id.*, Section 6.1.4, pg. 34).

[9] Permit, pgs. 20-25.

[10] Permit, pg. 41.

[11] If the data contains any exceedences of benchmarks, it must also be submitted to Mass DEP. See Permit, Section 9.1.2.4.

[12] Each failure to report results of benchmark monitoring for each parameter is a separate violation for each day that the failure continued.

To the extent additional reporting violations are learned through discovery in the action, the complaint will be amended to seek remedy for such additional reporting violations.[13]

4. Failure to Ensure That Control Measures Minimize Pollutant Discharges

The Permit requires H.C. Starck to ensure that its control measures minimize its stormwater pollutant discharges. Permit, Section 2.0 (pg. 12).[14] The company must modify its control measures as expeditiously as practicable whenever it finds that they "are not achieving their intended effect of minimizing pollutant discharges." *Id.*, Section 2.1. Because the company has not been regularly monitoring its pollutant discharges as required by the permit, it cannot know how its existing control measures are performing and therefore cannot have been modifying them as necessary to minimize stormwater pollutant discharges.

This Notice Letter alleges that H.C. Starck failed to implement adequate control measures based on information presently available to Clean Water Action. If additional information regarding this violation becomes known to Clean Water Action in the future, the complaint may set forth some or all of such additional information.

CONCLUSION

Clean Water Action believes this Notice of Violations and Intent to File Suit sufficiently states the basis for a civil action. During the 60-day notice period, we would be willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of litigation. If you wish to pursue such discussions, please have your attorney contact us within the next 20 days so that negotiations may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

Nora J. Chorover
Attorney for
CLEAN WATER ACTION

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[13] Additional discovered reporting violations may include, without limitation, failure to submit all reporting data to EPA no later than 30 days after receipt of laboratory results (Permit, Section 7.1).

[14] "Minimize" means "reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice." *Id.*

cc: (by certified mail)

Curt Spalding, Regional Administrator
EPA New England, Region 1,
5 Post Office Square, Ste. 100
Boston, MA 02109
Certified Mail # 7012 2210 0001 3554 3499

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Massachusetts Department of Environmental Protection
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CT Corporation System, Registered Agent for HC Starck, Inc.
155 Federal St., Suite 700
Boston, MA 02110
Certified Mail # 7012 2210 0001 3554 3536

Olaf Schmidt-Park, President
H.C. Starck, Inc.
45 Industrial Place
Newton, MA 02461
Certified Mail # 7012 2210 0001 3554 3543

EXHIBIT A

TABLE OF H.C. STARCK'S VIOLATIONS

June 30, 2009 to the present

Type of Violation	Parameter	Beginning Date of Violation	Earliest End Date of Violation
Failure to Conduct Comprehensive Site Inspection	n/a	September 29, 2009	Present
Failure to Conduct Comprehensive Site Inspection	n/a	September 29, 2010	Present
Failure to Conduct Comprehensive Site Inspection	n/a	September 29, 2011	Present
Failure to Conduct Comprehensive Site Inspection	n/a	September 29, 2012	Present
Failure to Conduct Comprehensive Site Inspection	n/a	September 29, 2013	Present
Failure to Submit Annual Report to EPA	n/a	November 13, 2009	Present
Failure to Submit Annual Report to EPA	n/a	November 13, 2010	Present
Failure to Submit Annual Report to EPA	n/a	November 13, 2011	Present
Failure to Submit Annual Report to EPA	n/a	November 13, 2012	Present
Failure to Submit Annual Reports to EPA	n/a	November 13, 2013	Present
Failure to Implement Adequate Control Measures	COD	February 19, 2009	Present
Failure to Implement Adequate Control Measures	TSS	February 19, 2009	Present
Failure to Implement Adequate Control Measures	Aluminum	February 19, 2009	Present
Failure to Implement Adequate Control Measures	Copper	February 19, 2009	Present
Failure to Implement Adequate Control Measures	Iron	February 19, 2009	Present
Failure to Implement Adequate Control Measures	Lead	February 19, 2009	Present
Failure to Implement Adequate Control Measures	Zinc	February 19, 2009	Present
Failure to Conduct Benchmark Monitoring: April – June QTR 2009	All	June 30, 2009	Present
Failure to Report Results of Benchmark Monitoring: April – June QTR 2009	All	July 31, 2009	Present
Failure to Conduct Benchmark Monitoring: July – September QTR 2009	All	September 30, 2009	Present
Failure to Report Results of Benchmark Monitoring: July – September QTR 2009	All	October 31, 2009	Present
Failure to Conduct Benchmark Monitoring: October – December QTR 2009	All	December 31, 2009	Present
Failure to Report Results of Benchmark Monitoring: October – December QTR 2009	All	January 31, 2010	Present
Failure to Conduct Benchmark Monitoring: January – March QTR 2010	All	March 31, 2010	Present

Failure to Report Results of Benchmark Monitoring: January – March QTR 2010	All	April 30, 2010	Present
Failure to Conduct Benchmark Monitoring: April – June QTR of 2010	All	June 30, 2010	Present
Failure to Report Results of Benchmark Monitoring: April – June QTR of 2010	All	July 31, 2010	Present
Failure to Conduct Benchmark Monitoring: July – September QTR 2010	All	September 30, 2010	Present
Failure to Report Results of Benchmark Monitoring: July – September QTR 2010	All	October 31, 2010	Present
Failure to Conduct Benchmark Monitoring: October – December QTR 2010	All	December 31, 2010	Present
Failure to Report Results of Benchmark Monitoring: October – December QTR 2010	All	January 31, 2011	Present
Failure to Conduct Benchmark Monitoring: January – March QTR 2011	All	March 31, 2011	Present
Failure to Report Results of Benchmark Monitoring: January – March QTR 2011	All	April 30, 2011	Present
Failure to Conduct Benchmark Monitoring: April – June QTR 2011	All	June 30, 2011	Present
Failure to Report Results of Benchmark Monitoring: April – June QTR 2011	All	July 31, 2011	Present
Failure to Conduct Benchmark Monitoring: July – September QTR 2011	All	September 30, 2011	Present
Failure to Report Results of Benchmark Monitoring: July – September QTR 2011	All	October 31, 2011	Present
Failure to Conduct Benchmark Monitoring: October – December QTR 2011	All	December 31, 2011	Present
Failure to Report Results of Benchmark Monitoring: October – December QTR 2011	All	January 31, 2012	Present
Failure to Conduct Benchmark Monitoring: January – March QTR 2012	All	March 31, 2012	Present
Failure to Report Results of Benchmark Monitoring: January – March QTR 2012	All	April 30, 2012	Present
Failure to Conduct Benchmark Monitoring: April – June QTR 2012	All	June 30, 2012	Present
Failure to Report Results of Benchmark Monitoring: April – June QTR 2012	All	July 31, 2012	Present
Failure to Conduct Benchmark Monitoring: July – September QTR 2012	All	September 30, 2012	Present
Failure to Report Results of Benchmark Monitoring: July – September QTR 2012	All	October 31, 2012	Present
Failure to Conduct Benchmark Monitoring: October – December QTR 2012	All	December 31, 2012	Present
Failure to Report Results of Benchmark Monitoring: October – December QTR 2012	All	January 31, 2013	Present
Failure to Conduct Benchmark Monitoring: January – March QTR 2013	All	March 31, 2013	Present
Failure to Report Results of Benchmark Monitoring: January – March QTR 2013	All	April 30, 2013	Present
Failure to Conduct Benchmark Monitoring: April – June QTR 2013	All	June 30, 2013	Present
Failure to Report Results of Benchmark Monitoring: April – June QTR 2013	All	July 31, 2013	Present
Failure to Conduct Benchmark Monitoring: July – September QTR 2013	All	September 30, 2013	Present
Failure to Report Results of Benchmark Monitoring: July – September QTR 2013	All	October 31, 2013	Present
Failure to Conduct Benchmark Monitoring: October – December QTR 2013	All	December 31, 2013	Present
Failure to Report Results of Benchmark Monitoring: October – December QTR 2013	All	January 31, 2014	Present

EXHIBIT B

DAYS BETWEEN
SEPTEMBER 25, 2009 AND SEPTEMBER 22, 2014
ON WHICH STORMWATER FROM H.C. STARCK'S FACILITY
DISCHARGED TO WATERS OF THE UNITED STATES

September 2009:	27, 28, 29
October 2009:	3, 4, 7, 8, 10, 14, 16, 18, 19, 24, 25, 28, 29
November 2009:	14, 15, 20, 24, 27, 28
December 2009:	1, 3, 6, 9, 10, 14, 21, 27, 29
January 2010:	3, 18, 19, 20, 26
February 2010:	11, 17, 24, 25, 26, 28
March 2010:	1, 5, 14, 15, 16, 23, 24, 26, 29, 30, 31
April 2010:	10, 16, 17, 18, 19, 27, 28,
May 2010:	8, 9, 15, 19, 20, 30,
June 2010:	1, 4, 5, 7, 10, 13, 21, 25, 29
July 2010:	11, 13, 14, 17, 24, 30
August 2010:	6, 10, 16, 23, 24, 25, 26
September 2010:	4, 8, 14, 17, 29
October 2010:	2, 4, 6, 7, 15, 16, 28
November 2010:	5, 6, 8, 9, 10, 17, 26
December 2010:	2, 13, 21, 23, 27
January 2011:	3, 12, 19, 20, 21, 22, 27
February 2011:	2, 3, 6, 8, 25, 26, 27
March 2011:	1, 7, 11, 12, 17, 22
April 2011:	1, 5, 13, 14, 17, 20, 24
May 2011:	5, 8, 11, 15, 16, 17, 18, 19, 20, 24
June 2011:	2, 9, 10, 12, 19, 23, 24, 26, 29
July 2011:	9, 14, 24, 26, 30
August 2011:	3, 7, 8, 9, 10, 15, 16, 20, 22, 28, 29
September 2011:	6, 7, 8, 9, 16, 21, 24, 29, 30
October 2011:	1, 2, 4, 5, 13, 14, 15, 20, 28, 30
November 2011:	11, 17, 23, 24, 30
December 2011:	7, 8, 22, 23, 28
January 2012:	12, 13, 17, 22, 27, 28
February 2012:	25
March 2012:	1, 2, 3, 4
April 2012:	2, 23, 24
May 2012:	2, 5, 9, 10, 15, 16, 23, 30
June 2012:	2, 3, 5, 8, 9, 13, 14, 23, 24, 26
July 2012:	4, 19, 29
August 2012:	1, 6, 11, 16, 29
September 2012:	4, 5, 6, 9, 16, 19, 29

October 2012:	1, 4, 8, 11, 14, 20, 29, 30, 31
November 2012:	8, 9, 14, 28
December 2012:	8, 9, 10, 17, 18, 19, 22, 27, 28, 30
January 2013:	12, 16, 17, 29, 31
February 2013:	9, 12, 20, 24, 25, 27, 28
March 2013:	7, 8, 9, 13, 19, 20
April 2013:	11, 13, 20, 24
May 2013:	9, 10, 20, 21, 24, 25, 29, 30
June 2013:	4, 8, 11, 12, 14, 15, 18, 19, 25, 28
July 2013:	12, 22, 24, 26, 27
August 2013:	10
September 2013:	2, 13, 22
October 2013:	5, 6
November 2013:	8, 18, 23, 27, 28
December 2013:	2, 7, 9, 10, 15, 18, 24, 30
January 2014:	3, 6, 7, 12, 15, 19, 22
February 2014:	4, 5, 6, 14, 16, 19, 20, 21, 22
March 2014:	13, 20, 30, 31
April 2014:	5, 8, 9, 16, 24, 27
May 2014:	1, 10, 11, 17, 23, 28, 31
June 2014:	4, 6, 14, 17, 26
July 2014:	4, 5, 15, 17, 28, 29
August 2014:	13, 14
September 2014:	1, 3, 14